

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky  
David R. Berz  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |
|---|---|
| -----X                                      |   |
| In re                                       | : |
|   | : |
|   | : |
|   | : |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , | : |
| f/k/a General Motors Corp., <i>et al.</i>   | : |
|   | : |
| Debtors.                                    | : |
| -----X                                      |   |

**DEBTORS' RESPONSE TO THE MOTION OF MARLA SOFFER FOR RELIEF  
FROM THE AUTOMATIC STAY TO CONTINUE SEPARATE LITIGATION**

TO THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) and certain of its subsidiaries, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), hereby submit this response to the Motion of Marla Soffer for Relief from the Automatic Stay to Continue a Separate Litigation [Docket No. 4703] (the "**Motion**"). The Debtors take no position in response to the Motion as the Motion seeks only to proceed with a prepetition appeal in Pennsylvania

State Court against a non-debtor codefendant (*See* Mot. ¶¶ 29 - 31). Accordingly, the Motion is inappropriately styled as a motion for relief from the automatic stay.

Dated: January 5, 2010  
New York, New York

/s / David R. Berz

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